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September 30, 2004

Ms. Tracie Billington  
Department of Water Resources  
Division of Planning and Local Assistance  
Post Office Box 942836  
Sacramento, CA 94236-0001

Dear Ms. Billington:

**DRAFT INTEGRATED REGIONAL WATER MANAGEMENT GRANT PROGRAM  
GUIDELINES (DRAFT GUIDELINES) FOR PROPOSITION 50, CHAPTER 8, DATED  
AUGUST 2004**

The City of Los Angeles, Bureau of Sanitation, Watershed Protection Division (WPD) reviewed the Draft Integrated Regional Water Management Grant Program Guidelines (Draft Guidelines) for Proposition 50, Chapter 8, dated August 2004. In general, the document presents a reasonable approach for determining grant program priorities. WPD agrees that focusing on integrated projects that have multiple and long-term benefits demonstrates foresight. WPD prepared the following comments for improving the Draft Guidelines:

**Extend deadline for Phase 1 of Implementation Grants.** The current schedule for the first round of grants favors regions that already have Integrated Regional Water Management (IRWM) plans. The City of Los Angeles and the watersheds in which the City exists currently do not have an IRWM plan as defined in the Draft Guidelines. We currently have a strong local stakeholder process in place, including active participation by entities such as neighboring cities, the Los Angeles County Department of Public Works, and the US Army Corps of Engineers, among many, and many others. Also, we have many already-completed documents that will support the IRWM plan, including the Bureau of Sanitation's draft Integrated Resources Plan, Los Angeles Department of Water and Power's Urban Water Management Plan, and the County's Los Angeles River Master Plan. We are eager to finalize an IRWM plan, but the process for finalizing an IRWM plan will take time, including significant public notice and participation that may be required per CWC Section 10753 et seq. To maximize participation in our region, WPD urges a reasonable time to develop comprehensive IRWM plans before starting the Implementation Grant phase. We believe December 2005 is a reasonable deadline.



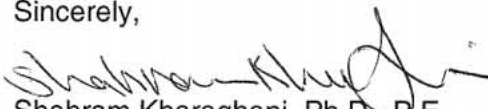
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**Keep schedule for Planning Grants.** Because preliminary planning has occurred and a solid foundation exists for a Los Angeles regional IRWM plan, stakeholders for the Los Angeles basin IRWM plan can work expeditiously to finalize a comprehensive IRWM plan. However, as discussed above, per CWC Section 10753 et seq., significant public notice and participation may be required. The current schedule for IRWM planning grants allows full participation by all entities, including those such as the City of Los Angeles and our anticipated co-applicants who have completed preliminary work towards such a plan, as well as others who may not have completed any preliminary work. As such, WPD recommends that Proposition 50 Planning grant applications and awards remain on the current schedule as proposed.

**Increase the number of priority projects per region.** From previous public meetings regarding Proposition 50, we understand that the Department of Water Resources is expecting each IRWM group to submit one priority project per region. The City of Los Angeles and the surrounding watersheds cover more than 1,350 square miles, collectively, and the City provides home to approximately ten percent of the State's population. Because of the size of our region, the City anticipates having several priority projects to improve our impaired water quality. Moreover, the City of Los Angeles has worked hard to establish strong working relationships with other key agencies in the basin. Allowing only one priority project per region would risk encouraging neighboring cities or other agencies in shared watersheds to apply and work competitively, rather than for a common watershed goal.

Thank you for the opportunity to comment. If you have additional questions or concerns, please contact Paul Teensma of my staff at (323) 342-1556 or by email at [pteensma@san.lacity.org](mailto:pteensma@san.lacity.org).

Sincerely,

  
Shahram Kharaghani, Ph.D., P.E.  
Program Manager

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cc: Rita L. Robinson, Director, Bureau of Sanitation  
Joseph Mundine, Assistant Director, Bureau of Sanitation  
Rafael E. Prieto, Office of Chief Legislative Analyst